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**SUBMISSION FOR DOCKET 2000-8164**

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Communication concerning the Reporting of the Causes of Airline Delays and Cancellations

On January 24, 2002, Steven Hayes from Continental airlines contacted Mr. Bernie Stankus of the Bureau of Transportation Statistics (BTS) concerning the BTS Notice of Proposed Rule Making (NPRM) published on December 27, 2001. The NPRM proposed that certain carriers be required to report the causes of airline delays and cancellations.

Specifically Mr. Hayes inquired about BTS re-instituting the pilot program for causal reporting, the implementation date of a final rule, and the possibility of separate code for airport/baggage security delays.

Mr Stankus stated that because of the events of September 11, 2001, the BTS cancelled its pilot reporting program. While the initial plan was to have those carriers covered by the rule begin reporting shortly after publication of the final rule, the effective date may have to include a longer lead time because BTS cancelled the pilot program which would have included all reporting carriers. Rather than re-instituting the pilot program, following publication of a final rule, BTS is considering conducting a public meeting on the reporting requirements. The meeting would occur prior to the rule's effective date.

Mr. Hayes stated that carrier on-time performance had improved significantly since the industry experienced a downturn in business as a result of a 20 percent cut in the number of flights. However, he believes that delays caused by security measures have increase 10 fold. For internal management decision making, Continental favors a system where security-caused delays are separated from normal air traffic control delays.

In order to make others aware of this issue and to ensure the issue is addressed directly in the final rule, Mr. Stankus suggested Continental submit a comment to the docket.